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November 29, 1997

Elijah Mondy,
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Country Club Hills, IL 60478

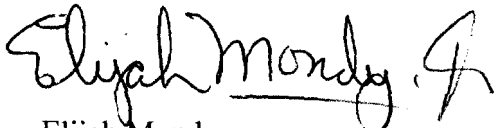
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Federal Communications Commission
Office of the Secretary
1919 M. Street Room 222 N.W.
Washington, D.C. 20554

To Whom It May Concern:

Enclosed are the original and four copies of comments regarding Notice of Proposed Rulemaking MM Docket No. 97-215 and RM-9168 to reallocate Channel 234A from Wilson, Arkansas to Turrell, Arkansas and modify the authorization for station KAFW (FM). These comments have been overnight expressed to insure getting to you by deadline date. If there are any questions, please call me at 708-957-5210. Thank you.

Sincerely,


Elijah Mondy,



In the Matter of

Amendment of Section 73.202(b)
Tablr of Allotments,)
FM Broadcast Stations.)
(Wilson and Turrell, Arkansas)

MM Docket No. 97-215)
RM-9168

COMMENTS OF

Elijah Mondy, Jr.
Mondy-Burke Boadcasting
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November 29, 1997

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It was disturbing reading the Notice of Proposed Rulemaking (RM-9168) (MM Docket No. 97-215) adopted October 1, 1997 and released October 10, 1997. Giving consideration and proposing to realloot channel 234A from Wilson to Turrell, AR, and to modify the authorization for station KAFW-FM.

This seems to me is an attempt by Pollack Broadcasting to do an "end-around" "slipping thru the back door" with the FCC. The original construction permit (BPH-891129MI) was to build this station in Wilson, AR and was granted on March 28, 1991. Subsequent replacement and extension applications have drug this process out to almost seven years and now they want to move the city of allotment to Turrell, AR which means that promises and overtures that were made to the Commission to get the permit to build this FM in Wilson would go down the drain and the community of Wilson would be denied.

The argument in the notice of proposed rule making that Wilson would continue to receive local aural transmission service from full-time AM station KOSE must take into consideration that KOSE is licensed to Osceola, AR. Also, if that be the case , you can say that Turrell, AR receives local aural transmissions from all of the stations in Memphis, TN.

Not only would the people of Wilson, AR be denied by having their allotted FM station snatched from them, but any individual of the community of Turrell or any one else would be locked out of the process of competing for the FM allotment in Turrell which is not fair, a violation of principle, and not in keeping with the spirit of the process.

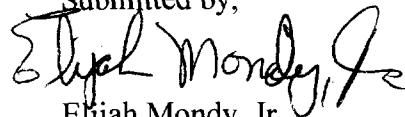
The Audio Services Division in a letter dated March 5, 1996 requested a certification from Pollack that construction at Wilson would commence immediately upon the granting of authorization on a new channel which the Division never got causing the returning of application BMPH-951103IC and the dismissal of BMPH-951103IC and a reprimand

regarding the original application from Mr. Dennis Williams Assistant Chief saying "The Mass Media Bureau is currently engaged in a vigorous effort to reduce the backlog of pending broadcast applications and to provide more efficient service to the public. Retaining in a pending status a facilities modification application which the applicant has no intention of constructing frustrates this goal. Significant staff resources are required to monitor the progress of applications which are ungrantable. These resources could be better spent in expediting approvals for new and upgraded service by other applicants. Moreover, pending but ungrantable applications constitute an inefficient use of scarce broadcast spectrum in that it may impede the efficient use of scarce spectrum by thwarting opportunity by those who are ready willing and able to build new or improved facilities." (1800B3-BJB)

It seems obvious to Mr. Williams and the Audio Services staff and to me that the spirit of the process and a principle have been violated. To now reward Pollack by granting this rule making undermines Mr. Williams reprimand. It is not in the best interest of The FCC, the community of Wilson, AR or individuals in the community of Turrell who may welcome the opportunity to compete for an allotted FM in their city.

Therefore; I am asking that the Commission reject this rulemaking to reallocate channel 234A from Wilson, AR to Turrell, Ar. and that this matter would revert back to the Audio Services Division and its latter decision. Furthermore if Pollack Broadcasting would like to build an FM in Turrell that they should be allowed to do so by doing a frequency search and going through the normal process.

Submitted by,



Elijah Mondy, Jr.

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cc Barry D. Wood
Wood & Brinton, Chartered